

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Criminal No. <u>17-CR-30047-NJR</u>
vs.)	
)	Title 18, United States Code, Section 1344(1)
ALFRED L. CROSS,)	
)	
Defendant.)	

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

Bank Fraud – 18 U.S.C. § 1344(1)

1. At times material to this information:

a. Defendant ALFRED L. CROSS (“CROSS”) owned several shell companies, including “Global Investment Group” and “Giant Hospitality Group.” CROSS opened bank accounts in the names of these shell companies in states other than Illinois.

b. The deposits of the following financial institutions were insured by the Federal Deposit Insurance Corporation (“FDIC”): Bradford National Bank, located in Highland and Greenville, Illinois; State Bank of Whittington, located in Sesser and Benton, Illinois; First Southern Bank, located in Carbondale, Illinois; The Farmers and Merchants National Bank, located in Nashville, Illinois; Community First Bank of the Heartland, located in Mount Vernon, Illinois; Midland States Bank, located in Effingham, Centralia, and Vandalia, Illinois; and Washington Savings Bank, located in Effingham, Illinois.

2. From at least April 14, 2011, through at least March 25, 2015, in Bond, Madison, Fayette, Effingham, Franklin, Jackson, Jefferson, and Washington Counties, within the Southern District of Illinois, and elsewhere,

ALFRED L. CROSS,

defendant herein, knowingly devised and engaged in a scheme to defraud Bradford National Bank, State Bank of Whittington, First Southern Bank, The Farmers and Merchants National Bank, Community First Bank of the Heartland, Midland States Bank, and Washington Savings Bank.

3. It was the object of the scheme that CROSS fraudulently obtained a total of more than \$500,000 from Bradford National Bank, State Bank of Whittington, First Southern Bank, The Farmers and Merchants National Bank, Community First Bank of the Heartland, Midland States Bank, and Washington Savings Bank.

4. CROSS opened checking accounts at each of the banks identified in paragraph 3 above.

5. After the checking accounts had been open for a period of time, CROSS deposited into those accounts large checks that were drawn on other bank accounts that CROSS owned and/or controlled. Often these checks were drawn on accounts in the name of Global Investment Group and Giant Hospitality Group.

6. At the time he deposited the large checks into his accounts at the banks identified in paragraph 3 above, CROSS knew that checks were NSF. Specifically, CROSS knew that the checks could not be honored because there were insufficient funds in the accounts upon which the checks were drawn.

7. Before the banks identified in paragraph 3 could discover that the large deposited checks were NSF, CROSS withdrew funds from the accounts in amounts nearly equal to the

amounts of the deposited NSF checks. CROSS frequently made these withdrawals by purchasing cashier's checks and withdrawing cash.

8. On April 14, 2011, CROSS deposited into his Washington Saving Bank account a check in the amount of \$18,875, drawn on an account entitled "Cross/Hart/Page – Special Account" at WestAmerica Bank. On April 19, 2011, and again on April 23, 2011, this \$18,875 check was returned to Washington Savings Bank as NSF.

9. On April 15, 2011, CROSS withdrew a total of \$13,100 from his Washington Savings Bank account. CROSS made these withdrawals in the form of cashier's checks payable to himself and "USA Inns," and in the form of bank checks payable to his personal creditors.

10. In 2011, CROSS opened an account at Midland States Bank in the name of "USA Inns." On July 28, 2011, CROSS deposited into the USA Inns account at Midland States Bank a check in the amount of \$47,835 drawn on the account of "Al Cross" at WestAmerica Bank. On August 5, 2011, this \$47,835 check was returned to Midland States Bank as NSF.

11. On August 1 & 2, 2011, CROSS withdrew a substantial portion of the \$47,835 from the USA Inns account in the form of cashier's checks. CROSS purchased these cashier's checks at the Effingham, Vandalia, and Centralia branches of Midland States Bank.

12. On August 31, 2012, CROSS opened an account at Community First Bank of the Heartland in the name of "Alfred L. Cross, doing business as 'Consolidated Motel Management Company.'" On October 4, 2012, CROSS deposited into that Consolidated Motel Management Company account a check in the amount of \$50,000 drawn on an account in the name of "Global Investment Group" at the Bank of Jackson. On October 9, 2012, this \$50,000 check was returned to Community First Bank of the Heartland as NSF.

13. On October 5, 2012, CROSS withdrew \$20,000 from the Consolidated Motel Management Company account in the form of three cashier's checks payable to himself, Premier Properties, and Giant Investment Group. On October 5 – 6, 2012, CROSS withdrew an additional \$8,500 from that same account in the form of cash withdrawals and a cashier's check payable to "Freedom Homes."

14. On March 11, 2013, CROSS opened an account at The Farmers and Merchants National Bank in the name of "Premier Business Properties." On June 24, 2013, CROSS deposited into that Premier Business Properties account a check in the amount of \$148,000 drawn on an account of "Giant Hospitality." On June 28, 2013, and again on July 2, 2013, this \$148,000 check was returned to The Farmers and Merchants National Bank as NSF.

15. On June 25, 2013, CROSS withdrew a total of \$99,503.34 from the Premier Business Properties account at The Farmers and Merchants National Bank in the form of seven cashier's checks. On June 26, 2013, CROSS withdrew an additional \$21,999.81 from that same account in the form of two additional cashier's checks.

16. On September 30, 2013, CROSS opened an account at First Southern Bank in the name of "Whitehouse Business Group." On October 24, 2013, CROSS deposited into this Whitehouse Business Group account a check in the amount of \$38,000 drawn on an account in the name of "Giant Hospitality Group." On November 1, 2013, this \$38,000 check was returned to First Southern Bank as NSF.

17. On October 25, 2013, CROSS withdrew a total of \$21,275 from the Whitehouse Business Group account at First Southern Bank in the form of four cashier's checks payable to a relative and his creditors. From October 25 – 29, 2013, CROSS withdrew an additional \$13,000 from that same account in the form of three checks which he cashed.

18. On March 31, 2014, CROSS opened an account at the State Bank of Whittington in the name of "Whitehouse Business Group." On May 15, 2014, CROSS deposited into this Whitehouse Business Group account a check in the amount of \$76,600 drawn on an account in the name of "Giant Hospitality Group." On May 15, 2014, CROSS deposited into that same account a \$33,400 check drawn on the account of Giant Hospitality Group. Later in May of 2014, both the \$76,600 check and the \$33,400 check were returned to the State Bank of Whittington as NSF.

19. On May 16, 2014, CROSS purchased three buildings owned by the State Bank of Whittington by writing three checks drawn on the account of Whitehouse Business Group at State Bank of Whittington. On May 19, 2014, CROSS withdrew \$30,000 from that same account in the form of an official check payable to "Premier Properties."

20. On December 18, 2014, an associate of CROSS with the initials "G.S." opened an account at Bradford National Bank in the name of "'G.S.,' doing business as Hospitality Management Company." CROSS went with G.S. to open this account. CROSS told Bradford National Bank that he was a silent partner of G.S.

21. On March 20, 2015, CROSS caused to be deposited into the Hospitality Management Company account a check in the amount of \$119,500 drawn on an account in the name of "Giant Hospitality Group." On March 25, 2015, that \$119,500 was returned to Bradford National Bank as NSF.

22. On March 23, 2015, Defendant caused \$61,814.16 to be withdrawn from the Hospitality Management Company account. Of this amount, \$55,514.16 was used to purchase a property owned by Bradford National Bank, \$5,000 was withdrawn in cash, and \$1,300 was withdrawn in the form of a cashier's check payable to another person.

23. On or about March 21, 2015,

ALFRED L. CROSS,

defendant herein, knowingly executed and attempted to execute the aforesaid scheme by causing \$62,500 to be withdrawn from the Hospitality Management Company account in the form of a \$30,000 cashier's check payable to Premier Properties, a \$25,000 cashier's check payable to a relative, and \$7,500 in cash;

In violation of Title 18, United States Code, Section 1344(1).



DONALD S. BOYCE
United States Attorney



SCOTT A. VERSEMAN
Assistant United States Attorney

Recommended bond: \$10,000 unsecured